

Meghan McElvy  
Texas State Bar No. 24065127  
BRADLEY ARANT BOULT CUMMINGS LLP  
600 Travis Street, Suite 5600  
Houston, Texas 77002  
Tel. 713.576.0314  
[mmcelvy@bradley.com](mailto:mmcelvy@bradley.com)

George H. Barber  
Texas State Bar No. 01705650  
BRADLEY ARANT BOULT CUMMINGS LLP  
1445 Ross Avenue, Suite 3600  
Dallas, TX 75202  
Phone: (214) 939-8700  
Fax: (214) 939-8787  
Email: [gbarber@bradley.com](mailto:gbarber@bradley.com)

**ATTORNEYS FOR STEVEN WEBSTER**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re: )  
 ) Case Number 22-30500-swe7  
DENNIS JAMES ROGERS, II, ) (Involuntary Proceeding)  
 )  
 )  
 )  
Debtor.

**NOTICE OF STEVEN WEBSTER'S MOTION FOR ALLOWANCE OF  
ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. § 503(b)(3)(a) and (4)**

**NOTICE**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE ST., DALLAS, TX 75242 BEFORE THE CLOSE OF BUSINESS ON SEPTEMBER 5, 2024, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT**

**MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

On August 14, 2024, petitioning creditor Steven Webster filed his Motion for Allowance of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(3)(a) and (4) (the “Motion”). The Motion requests allowance of an administrative expense claim for attorneys’ fees and expenses incurred by Mr. Steven Webster in connection with successfully filing and prosecuting the Involuntary Chapter 7 Petition against the debtor, Dennis James Rogers, II, pursuant to 11 U.S.C. § 303.

The total amount of the administrative expense claim sought is \$330,586.85, consisting of attorneys’ fees of \$323,898.24 and expenses of \$6,688.61.

Any party in interest may obtain a copy of the Motion free of charge by making a written request to Dustin Appel at Bradley Arant Boult Cummings LLP, 600 Travis Street #5600, Houston, Texas 77002, phone 713.576.0300, fax 713.576.0301, email [dappel@bradley.com](mailto:dappel@bradley.com).

Respectfully submitted,

/s/ Meghan Dawson McElvy  
Meghan Dawson McElvy  
Texas State Bar No. 24065127  
Bradley Arant Boult Cummings LLP  
600 Travis Street, Suite 5600  
Houston, Texas 77002  
Tel. 713.576.0314  
[mmcelvy@bradley.com](mailto:mmcelvy@bradley.com)

George H. Barber  
Texas State Bar No. 01705650  
Bradley Arant Boult Cummings LLP  
Fountain Place  
1445 Ross Ave., Suite 3600  
Dallas, TX 75202  
Telephone: 214-257-9800

[gbarber@bradley.com](mailto:gbarber@bradley.com)

*ATTORNEYS FOR STEVEN WEBSTER*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served concurrently with filing (a) by ECF upon all persons who have filed ECF appearances in this case and (b) by first class mail, postage prepaid, on the persons and entities set forth on the attached service list. The service list itself is omitted from service copies to avoid unnecessary copying and postage charges, but a copy can be obtained free of charge by making a written request to Dustin Appel at Bradley Arant Boult Cummings LLP, 600 Travis Street #5600, Houston, Texas 77002, phone 713.576.0300, fax 713.576.0301, email [dappel@bradley.com](mailto:dappel@bradley.com).

*/s/ Meghan Dawson McElvy*  
\_\_\_\_\_  
Meghan Dawson McElvy

Label Matrix for local noticing

0539-3

Case 22-30500-swe7

Northern District of Texas

Dallas

Tue Aug 13 16:07:36 CDT 2024

(p)JEFFERSON CAPITAL SYSTEMS LLC

PO BOX 7999

SAINT CLOUD MN 56302-7999

U.S. Attorney

1100 Commerce, 3rd Floor

Dallas, TX 75242-1074

1100 Commerce Street

Room 1254

Dallas, TX 75242-1305

American Express

P.O Box 650448

Dallas, TX 75265-0448

Apple Card

P.O Box 7247

Philadelphia, PA 19170-6112

Brent Bohn

1775 N Martin L King Blvd

Las Vegas, NV 89106-2101

Chase Bank

P.O Box Carol Strem

IL 60197-6294

Debra & Russell Van Cleve Schneider Miller R

300 N Coit Rd., Suite 1125

Richardson, TX 75080-5535

Discover Bank

P.O. Box 3025

New Albany, Oh 43054-3025

Dallas County

Linebarger Goggan Blair & Sampson, LLP

c/o Sherrel K. Knighton

2777 N Stemmons Frwy, Suite 1000

Dallas, TX 75207-2328

JPMorgan Chase Bank, N.A.

c/o Suyash Agrawal

Massey & Gail LLP

50 E. Washington Street, Suite 400

Chicago, IL 60602-2100

U.S. Attorney General

Department of Justice

Washington, DC 20001

ACMC Finance and Trade Joshua Kluewer

1055 W. 7th Street Suite 336

4 Los Angeles, CA 90017-2577

Andre Leblanc

P. O. Box 82009

Lafayette, LA 70598-2009

BAMCG Bridge Partners LP

13800 Seniac Dr. Ste 200

Dallas, TX 75234-8823

Carolyn Guilbeau Perry

530 Catholique Road

Carencro LA 70520-5603

Dallas County John R. Ames,

CTA 500 Elm Street

Dallas, TX 75202-3304

Dennis J. Woods

c/o Meghan McElvy

Chase Tower

600 Travis Street, Suite 5600

Houston, TX 77002-2909

Discover Card

P.O Box 30666

Salt Lake City, UT 84130-0666

Frost Bank

c/o Karl Dial

Greenberg Traurig, LLP

2200 Ross Avenue, Suite 5200

Dallas, TX 75201-2794

Mandarin Capital, LLC

2600 Cecil Drive

Holladay, UT 84124-2906

(p)WILDCAT LENDING FUND ONE LP

4800 DEXTER DRIVE

PLANO TX 75093-5505

ACMC Finance and Trade LLC

2820 Lucerne Avenue

Miami Beach Florida 33140-4267

Angela Garbiso

Schneider Miller Reynolds, P.C. David Mi

300 N. Coit Rd., Suite 1125

Richardson, TX 75080-5535

Bank of America

P.O Box 15019

Wilmington, DE 19850-5019

Carolyn Perry

3914 75th Place

Lubbock, TX 79423-1128

David Meche

5121 Johnston St.

Lafayette, LA 70503-5157

Dennis Rogers Sr.

County Rd 250

Durango, CO 81301

Eamonn J. Wiles

801 Cherry Street

Suite 2000

Fort Worth, TX 76102-6882

Eamonn J. Wiles  
Decker Jones, P.C.  
801 Cherry Street, Unit #46  
Fort Worth, TX 76102-6803

Ellis Guilbeau  
2014 Beau Bassin Rd  
Lafayette, LA 70520-5936

Frost Bank  
P.O Box 1600  
San Antonio, TX 78296-1600

Funderz.net 1022 Ave M  
Floor 2  
Brooklyn, NY 11230

Gerard Ballanco Jr  
611 East Prudhomme St.  
Opelousas, LA 70570-6458

Gerard Ballanco Jr.  
460 Judice Rd  
Sunset, Louisiana 70584-5156

Goldman Sachs  
100 Crescent Court  
Dallas TX 75201-7893

Holland & Hart  
222 S. Main St. #2200  
Salt Lake City UT 84101-2194

Infinity Global Fuel, Inc  
5100 Westheimer Suite 200  
Houston, TX 77056-5597

John & Ronda Harris  
231 Ramblewood Dr.  
Lafayette, LA 70508-7403

John Foreman  
1819 Pinhook Road Suite 215  
Lafayette, LA 70508-3700

John Hughes  
2000 Kaliste Saloom Road Suite 400  
Lafayette, LA 70508-6180

John S. Foreman III and Andre C. Leblanc  
Attn: J. Mark Chevallier, Esq.  
McGuire, Craddock & Strother, P.C.  
500 N. Akard St., Suite 2200  
Dallas, TX 75201-3317

Justin Leemay TFRE Investments LLC  
1831 W Crest Ridge Rd.  
Lehi, UT 84043-7757

Kathy Rogers  
County Rd 250  
Durango, CO 81301

Kenneth Guilbeau  
P.O Box 700  
Carencro, LA 70520-0700

Kenneth and Shawna Guilbeau  
3185 Highway 178  
Sunset LA 70584-5116

Lincoln Automotive Financial Services  
P.O Box 650574 Dallas  
TX 75265-0574

Lincoln Automotive Financial Services  
c/o Wilcox Law, PLLC  
P.O. Box 201849  
Arlington, TX 76006-1849

Linda Brown  
5340 Gooseberry Way  
Oceanside, CA 92057-4629

Linda Brown  
6545 Sequence Drive  
San Diego, CA 92121-4363

MCP Park District Residential  
2711 N. Haskell Ave Suite 2400  
Dallas, TX 75204-2926

Mandarin Capital LLC  
2100 Ross Ave., Suite 2700  
Dallas, TX 75201-7919

Mandarin Capital, LLC  
2290 E. 4500 S #260  
Salt Lake City, UT 84117-4494

Mandarin Capital, LLC  
Lynn Pinker Hurst & Schwegmann LLP  
2100 Ross Avenue, Ste. 2700  
Dallas, TX 75201-7919

Mccathern Law Firm  
3710 Rawlins Street Suite 1600  
Dallas, TX 75219-4258

Noor Concepts  
555 E 5th Street Apt 3022  
Austin, TX 78701-4153

Noor Concepts LLC  
c/o Nicoud Law  
10440 N. Central Expressway  
Suite 800  
Dallas, TX 75231-2264

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Perry Judice Russell Devenport  
McDonald Sanders, P.C.  
777 Main Street, Suite 1300  
Fort Worth, TX 76102-5385

Raymond McKaskle  
1216 Ridgewood Place  
Houston, TX 77055-5048

Raymond McKaskle  
1216 Ridgewood Place  
Houston, TX 77055-5048

Scott Faulkner  
683 O Lakehurst Avenue  
Dallas, TX 75230

Document Page 6 of 7

Steven A Webster David R. Eastlake Baker Bot  
910 Louisiana St.  
Houston, TX 77002-4916

Steven A. Webster, Aaron Webster, and Dennis  
c/o George H. Barber  
BRADLEY ARANT BOULT CUMMINGS LLP/ Founta  
1445 Ross Avenue, Suite 3600  
Dallas, TX 75202-2761

Steven Wang  
20 Camelot Rd.  
Windham NH 03087-1632

Steven Webster  
c/o Meghan McElvy  
Chase Tower, 600 Travis Street, Suite 56  
Houston, TX 77002-3009

Synchrony Bank  
P.O Box 965003  
Orlando, FL 32896-5003

Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk VA 23541-1021

Tony May  
1850 E. Sahara Ave. Suite 206  
Las Vegas, NV 89104-3746

Troya L Montgomery  
350 Ambroise  
Newport Coast, CA 92657-0127

Troya Montgomery  
350 Ambroise  
Newport Coast, CA 92657-0127

United States Trustee  
1100 Commerce Street  
Room 976  
Dallas, TX 75242-0996

WeWork  
115 W 18th St  
New York, NY 10011-4113

Wildcat Lending  
4800 Dexter Drive  
Plano Plano, TX 75093-5505

Angela Garbiso  
c/o David Miller  
Schneider Miller Reynolds, P.C.  
300 N. Coit Road, Suite 1125  
Richardson, TX 75080-5535

Areya Holder  
Areya Holder, Trustee  
Law Office of Areya Holder, PC  
PO Box 2105  
Addison, TX 75001-2105

Brandon J Gibbons  
FUNDERZ.NET, LLC  
C/O Padfield & Stout, L.L.P.  
420 Throckmorton Street, Suite 1210  
Fort Worth, TX 76102-3792

Debra A. Van Cleve  
c/o David Miller  
Schneider Miller Reynolds, P.C.  
300 N. Coit Road, Suite 1125  
Richardson, TX 75080-5535

Dennis James Rogers II  
6520 Del Norte Lane  
Dallas, TX 75225-2619

Ellis Guilbeau  
c/o Russell Devenport  
777 Main St  
Suite 2700  
Fort Worth, TX 76102-5366

Eric Liepins, PC  
12770 Coit Raod  
Suite 850  
Dallas, TX 75251-1364

Eric A. Liepins  
Legal Aid of Northwest Texas  
1515 Main Street  
Dallas, TX 75201-4841

John O. Harris  
c/o Russell Devenport  
777 Main Street  
Suite 2700  
Fort Worth, TX 76102-5366

Kenneth Guilbeau  
c/o Russell Devenport  
777 Main St  
Suite 2700  
Fort Worth, TX 76102-5366

Michael H. Moghimi  
c/o Nicoud Law  
10440 N. Central Expwy.  
Suite 800  
Dallas, TX 75231-2264

Raymond McKaskle  
c/o Russell Devenport  
777 Main Street  
Suite 2700  
Fort Worth, TX 76102-5366

Ronda A. Harris  
c/o Russell Devenport  
777 Main Street  
Suite 2700  
Fort Worth, TX 76102-5366

Russell Van Cleve  
c/o David Miller  
Schneider Miller Reynolds, P.C.  
300 N. Coit Road, Suite 1125  
Richardson, TX 75080-5535

Shawna Guilbeau  
c/o Russell Devenport  
777 Main St, Suite 2700  
Fort Worth, TX 76102-5366

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

JEFFERSON CAPITAL SYSTEMS LLC	Wildcat Lending Fund One, LP	(d)Jefferson Capital Systems, LLC
PO BOX 7999	4800 Dexter Drive	PO Box 7999
ST CLOUD, MN 56302-9617	Plano, TX 75093	St. Cloud, MN 56302-9617

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ACMC Finance and Trade LLC	(u)BAMCG Bridge Partners LP	(u)Dortch Lindstrom Livingston Law Group
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(u)FUNDERZ.NET, LLC	(u)Goldman Sachs & Company LLC	(u)John S. Foreman, III
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(u)Lincoln Automotive Financial Services	(u)Quilling, Selander, Lownds, Winslett & Mos	(u)Schneider Miller Reynolds, P.C.
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(d)John and Ronda Harris 231 Ramblewood Dr. Lafayette, LA 70508-7403	(d)Mandarin Capital 2600 Cecil Drive Holladay UT 84124-2906	(u)Allison Rogers
--	---	-------------------

(u)Andre C. Leblanc

End of Label Matrix

Mailable recipients	91
Bypassed recipients	13
Total	104